

Message

From: Miller, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB7A864DD08445B0A59A63FA36836677-ROBERT MILLER]
Sent: 6/29/2016 10:52:03 AM
To: Ryan Seaverson [rseaverson@safetycall.com]
CC: Panger, Melissa [Panger.Melissa@epa.gov]; Medici, Andrea [medici.andrea@epa.gov]
Subject: RE: Extraterritorial AE Reporting

Hi Ryan,

This is a subject of some contention and the Agency needs a consistent position. Andrea Medici, who is handling this issue for OGC is cc'd on this message.

Bob

Robert A. Miller
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From: Ryan Seaverson [mailto:rseaverson@safetycall.com]
Sent: Thursday, June 23, 2016 12:24 PM
To: Miller, Robert <Miller.Robert@epa.gov>
Subject: Extraterritorial AE Reporting

Hi Robert,

My name is Ryan Seaverson and I am a regulatory manager at SafetyCall International, an industry poison control center that provides AE management and regulatory reporting support for many pesticide registrants.

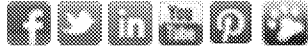
A client of our recently raised a question to me regarding extraterritorial AE reporting and after review the regulations and PR notices I am still a bit unclear as to what their reporting requirements are. If our client has EPA registered pesticides and also sells products internationally that contain the same active ingredient, are the international AEs reportable to EPA under FIFRA 6a2? The US and international products differ in their formulations but do share the same AI.

Any clarification you can provide would be greatly appreciated.

Best regards,

Ryan Seaverson, MBS, RAC
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